

LEE, LLC

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(Newark Vicinage)**

SEHOON CHANG,

Plaintiff,

Case 2:23-cv-02590-KSH-JRA

vs.

ABLE C&C CO. LTD.,

Defendant.

**NOTICE OF MOTION FOR
SUBSTITUTED SERVICE**

TO ABLE C&C CO. LTD.
Attn: Ms. Eugene Kim, CEO a/k/a Yoo Jin Kim
78 Namdaemun-ro, 7th Floor
Jung-gu, Seoul 153773
South Korea
eugenekim@ablecnc.com

DEAR SIR OR MADAM:

PLEASE TAKE NOTICE that Plaintiff, Sehoon Chang, through undersigned counsel, will move before this Honorable Court, at the U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, on **SEPTEMBER 5,**

2023, AT 9:00 A.M., or as soon thereafter as counsel can be heard, for an Order permitting substituted service on Defendant, Able C&C Co. Ltd.

PLEASE TAKE FURTHER NOTICE that in support of this application, Plaintiff shall rely upon the two accompanying declarations with exhibit(s) and memorandum of law. A proposed form of Order is also submitted for the Court's consideration.

PLEASE TAKE FURTHER NOTICE that Plaintiff waives oral argument.

Respectfully submitted,

LEE, LLC

*Attorneys for Plaintiff,
Sehoon Chang*

/s/ Peter Y. Lee

By: _____
PETER Y. LEE, ESQ. (PL2405)

Date: Aug. 11, 2023